

## Mark B. Frost & Associates

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December 29, 2016

### **VIA ECF**

The Honorable David R. Strawbridge  
Eastern District of Pennsylvania  
Courtroom 3H  
601 Market Street  
Philadelphia, PA 19103

**RE: Joshua Taylor v. Larry Shields, et. al.,  
Civil Docket No.: 2:13-cv-2241**

Dear Judge Strawbridge:

I write briefly to seek leave to address one issue raised in Defendant's response to Plaintiff's post-trial motion, specifically regarding the ordering of transcripts, as follows:

Opposing counsel asserts that Plaintiff's counsel has not ordered any trial transcripts; this is not accurate. As attached, Plaintiff has in fact submitted a transcript purchase order, dated December 19, 2016, to the EDPA transcript office. See Exhibit A. Further, on December 22, 2016, after the EDPA transcript office received the transcript order and reached out to me via phone, I submitted an amended transcript order – at the request of the transcript office – to clarify what transcripts were being requested, via email to Connie Flores of the transcript office. See, Exhibit B. Lastly, we of course ordered pertinent portions of the transcript prior to filing the post-trial motion, specifically Dr. Arden's voir dire, and attached same to Plaintiff's post-trial motion.

Thank you for Your Honor's continued attention to these matters.

**MARK B. FROST & ASSOCIATES**

/s/ Ryan Lockman  
RYAN LOCKMAN, ESQUIRE  
Counsel for Plaintiffs

CC: Kevin Hubbard (via ecf)

# **EXHIBIT “A”**

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December 19, 2016

**VIA FEDEX**

Attn: David Hayes  
Eastern District of Pennsylvania  
Room 2609  
601 Market Street  
Philadelphia, PA 19103

**RE: Joshua Taylor v. Larry Shields  
Civil Docket No.: 2:13-cv-2241**

Dear Mr. Hayes:

Please find enclosed a request for trial transcripts in the above-captioned matter.

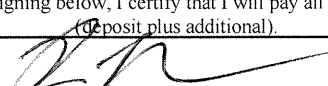
Please let me know if you have any questions. Thank you.

**MARK B. FROST & ASSOCIATES**



RYAN LOCKMAN, ESQUIRE  
Counsel for Plaintiff

Encl.

AO 435 (Rev. 04/11)		Administrative Office of the United States Courts			<b>FOR COURT USE ONLY</b>	
<b>TRANSCRIPT ORDER</b>					<b>DUE DATE:</b>	
<i>Please Read Instructions:</i>						
1. NAME <b>Ryan Lockman</b>		2. PHONE NUMBER <b>215 357 3333</b>		3. DATE <b>12/19/16</b>		
4. MAILING ADDRESS <b>1515 Market St, Ste 300</b>		5. CITY <b>Philadelphia</b>		6. STATE <b>PA</b>		7. ZIP CODE <b>19102</b>
8. CASE NUMBER <b>13-2241</b>		9. JUDGE <b>Stawbridge</b>		DATES OF PROCEEDINGS		
				10. FROM <b>11/1/16</b> 11. TO <b>11/7/16</b>		
12. CASE NAME <b>Taylor v. Shields</b>		LOCATION OF PROCEEDINGS				
		13. CITY <b>Philadelphia</b> 14. STATE <b>PA</b>				
15. ORDER FOR						
<input type="checkbox"/> APPEAL		<input type="checkbox"/> CRIMINAL		<input type="checkbox"/> CRIMINAL JUSTICE ACT		<input type="checkbox"/> BANKRUPTCY
<input type="checkbox"/> NON-APPEAL		<input checked="" type="checkbox"/> CIVIL		<input type="checkbox"/> IN FORMA PAUPERIS		<input type="checkbox"/> OTHER
16. TRANSCRIPT REQUESTED (Specify portion(s) and date(s) of proceeding(s) for which transcript is requested)						
PORTIONS		DATE(S)		PORTION(S)		DATE(S)
<input type="checkbox"/> VOIR DIRE				<input type="checkbox"/> TESTIMONY (Specify Witness)		
<input type="checkbox"/> OPENING STATEMENT (Plaintiff)						
<input type="checkbox"/> OPENING STATEMENT (Defendant)						
<input type="checkbox"/> CLOSING ARGUMENT (Plaintiff)				<input type="checkbox"/> PRE-TRIAL PROCEEDING (Specy)		
<input type="checkbox"/> CLOSING ARGUMENT (Defendant)						
<input type="checkbox"/> OPINION OF COURT						
<input type="checkbox"/> JURY INSTRUCTIONS				<input checked="" type="checkbox"/> OTHER (Specify)		
<input type="checkbox"/> SENTENCING				<b>All Trial</b>		<b>11/1/16 to 11/7/16</b>
<input type="checkbox"/> BAIL HEARING						
17. ORDER						
CATEGORY	ORIGINAL (Includes Certified Copy to Clerk for Records of the Court)	FIRST COPY	ADDITIONAL COPIES	NO. OF PAGES ESTIMATE		COSTS
ORDINARY	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	NO. OF COPIES			
14-Day	<input type="checkbox"/>	<input type="checkbox"/>	NO. OF COPIES			
EXPEDITED	<input type="checkbox"/>	<input type="checkbox"/>	NO. OF COPIES			
DAILY	<input type="checkbox"/>	<input type="checkbox"/>	NO. OF COPIES			
HOURLY	<input type="checkbox"/>	<input type="checkbox"/>	NO. OF COPIES			
REALTIME	<input type="checkbox"/>	<input type="checkbox"/>				
CERTIFICATION (18. & 19.) By signing below, I certify that I will pay all charges (deposit plus additional).				ESTIMATE TOTAL		0.00
18. SIGNATURE 				PROCESSED BY		
19. DATE <b>12/19/16</b>				PHONE NUMBER		
TRANSCRIPT TO BE PREPARED BY				COURT ADDRESS		
ORDER RECEIVED		DATE	BY			
DEPOSIT PAID				DEPOSIT PAID		
TRANSCRIPT ORDERED				TOTAL CHARGES		0.00
TRANSCRIPT RECEIVED				LESS DEPOSIT		0.00
ORDERING PARTY NOTIFIED TO PICK UP TRANSCRIPT				TOTAL REFUNDED		
PARTY RECEIVED TRANSCRIPT				TOTAL DUE		0.00

DISTRIBUTION:

COURT COPY

TRANSCRIPTION COPY

ORDER RECEIPT

ORDER COPY

AO 435  
(Rev. 04/11)

## INSTRUCTIONS

### GENERAL

**Use.** Use this form to order the transcription of proceedings. Complete a separate order form for each case number for which transcripts are ordered.

**Completion.** Complete Items 1-19. Do *not* complete shaded areas which are reserved for the court's use.

**Order Copy.** Keep a copy for your records.

**Submitting to the Court.** Submit the form in the format required by the court.

**Deposit Fee.** The court will notify you of the amount of the required deposit fee which may be mailed or delivered to the court. Upon receipt of the deposit, the court will process the order.

**Delivery Time.** Delivery time is computed from the date of receipt of the deposit fee or for transcripts ordered by the federal government from the date of receipt of the signed order form.

**Completion of Order.** The court will notify you when the transcript is completed.

**Balance Due.** If the deposit fee was insufficient to cover all charges, the court will notify you of the balance due which must be paid prior to receiving the completed order.

### SPECIFIC

Items 1-19. These items should always be completed.

Item 8. Only one case number may be listed per order.

Item 15. Place an "X" in each box that applies.

Item 16. Place an "X" in the box for each portion requested. List specific date(s) of the proceedings for which transcript is requested. Be sure that the description is clearly written to facilitate processing. Orders may be placed for as few pages of transcript as are needed.

Item 17. *Categories.* There are six (6) categories of transcripts which may be ordered. These are:

Ordinary. A transcript to be delivered within thirty (30) calendar days after receipt of an order. (Order is considered received upon receipt of the deposit.)

14-Day. A transcript to be delivered within fourteen (14) calendar days after receipt of an order.

Expedited. A transcript to be delivered within seven (7) calendar days after receipt of an order.

Daily. A transcript to be delivered following adjournment and prior to the normal opening hour of the court on the following morning whether or not it actually is a court day.

Hourly. A transcript of proceedings ordered under unusual circumstances to be delivered within two (2) hours.

Realtime. A draft unedited transcript produced by a certified realtime reporter as a byproduct of realtime to be delivered electronically during proceedings or immediately following adjournment.

**NOTE:** Full price may be charged only if the transcript is delivered within the required time frame. For example, if an order for expedited transcript is not completed and delivered within seven (7) calendar days, payment would be at the 14-day *delivery* rate, and if not completed and delivered within 14 calendar days, payment would be at the ordinary delivery rate.

*Ordering.* Place an "X" in each box that applies. Indicate the number of additional copies ordered.

Original. Original typing of the transcript. An original must be ordered and prepared prior to the availability of copies. The original fee is charged only once. The fee for the original includes the copy for the records of the court.

First Copy. First copy of the transcript after the original has been prepared. All parties ordering copies must pay this rate for the first copy ordered.

Additional Copies. All other copies of the transcript ordered by the same party.

Item 18. Sign in this space to certify that you will pay all charges. (This includes the deposit plus any additional charges.)

Item 19. Enter the date of signing.

Shaded Area. Reserved for the court's use.

# **EXHIBIT “B”**

**rlockman@m frostlaw.com**

---

**From:** rlockman@m frostlaw.com  
**Sent:** Thursday, December 22, 2016 10:02 AM  
**To:** 'connie\_flores@paed.uscourts.gov'  
**Cc:** 'Ryan Lockman'  
**Subject:** Taylor v. Shields  
**Attachments:** doc00422520161222100324.pdf

Connie:

Per our conversation today, please find enclosed an amended transcript purchase Order. Per our conversation, I checked the specific boxes I wanted, and kept the "all trial" request that I had written on the original transcript purchase form.

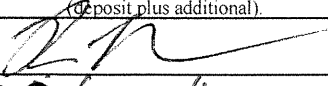
Let me know if this suffices.

Thanks,

Ryan

Ryan Lockman, Esq.  
MARK B. FROST & ASSOCIATES  
1515 Market Street, Suite 1300  
Philadelphia, PA 19102  
t: (215) 351-3333  
f: (215) 351-3332  
RLockman@MFrostLaw.com



AO 435 (Rev. 04/11)		Administrative Office of the United States Courts		<b>FOR COURT USE ONLY</b>	
Please Read Instructions:		Amended <b>TRANSCRIPT ORDER</b>		<b>DUE DATE:</b>	
1. NAME <b>Ryan Lockman</b>		2. PHONE NUMBER <b>215 357 3333</b>		3. DATE <b>12/28/16</b>	
4. MAILING ADDRESS <b>1515 Market St. Ste 1300</b>		5. CITY <b>Philadelphia</b>		6. STATE <b>PA</b>	7. ZIP CODE <b>19102</b>
8. CASE NUMBER <b>13-2241</b>		9. JUDGE <b>Strombridge</b>		DATES OF PROCEEDINGS	
				10. FROM <b>11/1/16</b>	11. TO <b>11/7/16</b>
12. CASE NAME <b>Taylor v. Shields</b>				LOCATION OF PROCEEDINGS	
				13. CITY <b>Philadelphia</b>	14. STATE <b>PA</b>
15. ORDER FOR					
<input type="checkbox"/> APPEAL		<input type="checkbox"/> CRIMINAL		<input type="checkbox"/> CRIMINAL JUSTICE ACT	
<input type="checkbox"/> NON-APPEAL		<input checked="" type="checkbox"/> CIVIL		<input type="checkbox"/> BANKRUPTCY	
				<input type="checkbox"/> IN FORMA PAUPERIS	
				<input type="checkbox"/> OTHER	
16. TRANSCRIPT REQUESTED (Specify portion(s) and date(s) of proceeding(s) for which transcript is requested)					
PORTIONS		DATE(S)		PORTION(S)	
<input checked="" type="checkbox"/> VOIR DIRE		<b>11/1-11/7/16</b>		<input checked="" type="checkbox"/> TESTIMONY (Specify Witness)	
<input checked="" type="checkbox"/> OPENING STATEMENT (Plaintiff)				<b>All witnesses</b>	
<input checked="" type="checkbox"/> OPENING STATEMENT (Defendant)					
<input checked="" type="checkbox"/> CLOSING ARGUMENT (Plaintiff)				<input checked="" type="checkbox"/> PRE-TRIAL PROCEEDING (Specy)	
<input checked="" type="checkbox"/> CLOSING ARGUMENT (Defendant)				<b>10/24, 10/20/16</b>	
<input type="checkbox"/> OPINION OF COURT					
<input checked="" type="checkbox"/> JURY INSTRUCTIONS		↓		<input checked="" type="checkbox"/> OTHER (Specify)	
<input type="checkbox"/> SENTENCING				<b>All Trial</b>	
<input type="checkbox"/> BAIL HEARING				<b>11/1/16 to 11/7/16</b>	
17. ORDER					
CATEGORY	ORIGINAL (Includes Certified Copy to Clerk for Records of the Court)	FIRST COPY	ADDITIONAL COPIES	NO. OF PAGES ESTIMATE	COSTS
ORDINARY	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	NO. OF COPIES		
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EXPEDITED	<input type="checkbox"/>	<input type="checkbox"/>	NO. OF COPIES		
DAILY	<input type="checkbox"/>	<input type="checkbox"/>	NO. OF COPIES		
HOURLY	<input type="checkbox"/>	<input type="checkbox"/>	NO. OF COPIES		
REALTIME	<input type="checkbox"/>	<input type="checkbox"/>			
CERTIFICATION (18. & 19.) By signing below, I certify that I will pay all charges (Deposit plus additional).				ESTIMATE TOTAL	0.00
18. SIGNATURE 				PROCESSED BY	
19. DATE <b>12/22/16</b>				PHONE NUMBER	
TRANSCRIPT TO BE PREPARED BY				COURT ADDRESS	
ORDER RECEIVED		DATE	BY		
DEPOSIT PAID				DEPOSIT PAID	
TRANSCRIPT ORDERED				TOTAL CHARGES	0.00
TRANSCRIPT RECEIVED				LESS DEPOSIT	0.00
ORDERING PARTY NOTIFIED TO PICK UP TRANSCRIPT				TOTAL REFUNDED	
PARTY RECEIVED TRANSCRIPT				TOTAL DUE	0.00

DISTRIBUTION: COURT COPY TRANSCRIPTION COPY ORDER RECEIPT ORDER COPY